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5 UNITED STATES COURT
6 WESTERN DISTRICT COURT OF WASHINGTON
7 SEATTLE

8 In re:

9 WON YONG HA and MONICA YOUNG HA

10 Plaintiff

11 vs.

12 US BANK NATIONAL ASSOCIATION,
13 NOT INDIVIDUALLY BUT SOLELY AS
14 TRUSTEE FOR BLUE WATER
15 INVESTMENT TRUST AND SELENE
16 FINANCE LP AND FORECLOSURE
17 TRUSTEE, MICHELLE R. GHIDOTTI, ESQ.

18 Defendant.

CASE NO.: 2:19-cv-00492-RAJ

REPLY DECLARATION OF PLAINTIFFS

OBJECTION TO DECLARATION OF NON-MONETARY
STATUS OF DEFENDANT FORECLOSURE TRUSTEE,
MICHELLE R. GHIDOTTI, ESQ.

Noted for 07/12/2019

19 COMES NOW: Plaintiffs Won Yong Ha and Monica Young Ha, aka Yong Hee Ha Yoo, here
20 after Ha, and provides this declaration as a basis to tolled the 30 day response time as presented
21 in Defendants Objection filed on 07/10/2019 Docket # 12.

22 I, Monica Yong declare under penalty of perjury under the laws of the State of Washington that
23 the following is true and correct. I have personal knowledge of the facts stated here in.

24 On I filed a chapter 13 bankruptcy Western District Bankruptcy Court case # 19-11844. This
25 was a emergency Bankruptcy filing. The Bankruptcy was dismissed on closed on June 25th 2019.
26 The filing would stay and toll the time as to the 30-day response or is good cause. My Husband
27
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REPLY DECLARATION OF HA 1

WON YONG HA AND MONICA YOUNG HA
9419-Points Dr. NE
Clyde Hill WA, 98004

1 and I have provided specific breach of the deed of trust act and the claims against trustee should
2 be heard on merits of the case not by a late response or objection.

3 Fed. R. Civ. P. 6 (b) Extending Time. (1) In General. When an act may or must be done within a
4 specified time, the court may, for good cause, extend the time: (A) with or without motion or
5 notice if the court acts, or if a request is made, before the original time or its extension expires;
6 or (B) on motion made after the time has expired if the party failed to act because of excusable
7 neglect.

9 Defendant filed their notice of non-monetary status on May 13th 2019 (*before plaintiff opted in*
10 *for ECF filing*) per court rules mailing time would add three days for postal delivery and the
11 required one day to act so deadline would be June 17th 2019, Plaintiff response was made 8 days
12 later for good cause the time to object should be extended and Plaintiffs response heard.

14 Respectfully I ask the court at its discretion review our docket # 9 and 10 and based their ruling
15 on the facts stated by Plaintiff, Ha responded on the same day the Bankruptcy dismissed and
16 submitted a bona fide objection to non-monetary status.

18
19 Sign this 15th day of July, 2019 at King County WA

20 /s/Monica Young Ha

21 Monica Young Ha
22 9419-Points Drive NE
23 Clyde Hill WA, 98004
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1 The undersigned makes the following declaration:

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3 1. I am now, and at all times herein mentioned a resident of the State of Washington, over
4 the age of eighteen years and I have knowledge of the facts stated herein.

5 2. On July 15, 2019 I caused a copy of the foregoing Declaration reply to be served to the
6 following parties to case by ECF notice.
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8
9 Kristin A Zilberstein
10 LAW OFFICE OF ANGELA M MICHAEL
11 3100 NW BUCKLIN HILL ROAD
12 STE 206F
13 SILVERDALE, WA 98383
14 619-243-3921

15 Sign this 15th day of July at King county WA

16 /s/Monica Young Ha
17 Monica Young Ha
18 9419-Points Drive NE
19 Clyde Hill WA, 98004
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